

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PHOENIX BOND & INDEMNITY, CO., et al.,	)	
	)	
Plaintiffs,	)	No. 05 C 4095
	)	(Consolidated for Pretrial Purposes
v.	)	with No. 07 C 1367)
	)	
JOHN BRIDGE, et al.,	)	Judge Matthew F. Kennelly
	)	
Defendants.	)	

**BG DEFENDANTS' RENEWED MOTION FOR JUDGMENT  
AS A MATTER OF LAW OR, ALTERNATIVELY, FOR NEW TRIAL\***

The BG Defendants respectfully move for judgment as a matter of law under Federal Rule of Civil Procedure 50(b) or, in the alternative, for a new trial under Federal Rule of Civil Procedure 59, and for related and/or alternative relief for the reasons set forth in the accompanying Memorandum of Law.

Dated: December 13, 2011

Respectfully submitted,

**BG DEFENDANTS,**

By: /s/ Arthur W. Friedman  
One of their Attorneys

\* The "BG Defendants" are defendants BG Investments, Inc. ("BG Investments"), Bonnie Gray ("Bonnie"), Atlantic Municipal Corporation ("Atlantic Municipal"), Midwest Real Estate Investment Company ("MREIC"); Bonnie Gray as executor of the Estate of David Gray and as Trustee of the David Gray Revocable Trust; and Midwest Real Estate Investment Company Employee Profit-Sharing Plan and Trust ("PS Plan").

Plaintiffs' Complaint also names as defendants Wheeler-Dealer Ltd. ("Wheeler-Dealer") and Timothy Gray ("Timothy" or "Tim") (collectively "Wheeler Defendants"), who are separately represented and as to whom a mistrial has been declared.

The BG Defendants and the Wheeler Defendants are sometimes referred to herein collectively as the "Gray Defendants".

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on December 13, 2011, he served copies of the foregoing **BG DEFENDANTS' RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW OR, ALTERNATIVELY, FOR NEW TRIAL** on the parties of record pursuant to ECF as to Filing Users.

/s/ Arthur W. Friedman  
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